

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:

TIMOTHY DONALD EYMAN,  
  
Debtor.

No. 18-14536

*EX PARTE* APPLICATION FOR ORDER  
AUTHORIZING TRUSTEE TO EMPLOY  
GENERAL COUNSEL

COMES NOW Virginia A. Burdette, Chapter 7 Trustee herein, and on *ex parte* moves that the Court enter an order authorizing her to employ Thomas S. Linde and Schweet, Linde & Coulson, PLLC as general counsel for the Trustee in the above-captioned case. The Trustee's motion is based upon the following representations:

1. This case was filed as a Chapter 11 proceeding on November 28, 2018 and later converted to Chapter 7 on December 17, 2021. Shortly thereafter, I was appointed as the Chapter 7 Trustee.

2. I require the assistance of general counsel to aid me with pending litigation over potential assets of the Bankruptcy Estate and for general assistance with the administration of the Chapter 7 case.

3. I have conferred with, and now desire to employ, Thomas S. Linde and Schweet Linde & Coulson, PLLC as general counsel to perform the above-described services, which are necessary and desirable to the administration of this estate. I have selected Mr. Linde and Schweet, Linde & Coulson, PLLC because of their experience and knowledge of the law in the issues presented above. Accordingly, I believe they are well qualified to represent the Estate.

4. It is necessary that I employ Schweet, Linde & Coulson, PLLC on an hourly fee basis at the following rates: Michael M. Sperry: \$450.00 per hour; Thomas S. Linde: \$450.00 per hour; Laurin Schweet:

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COUNSEL - 1

VIRGINIA A. BURDETTE  
P.O. Box 16600  
Seattle, WA 98116  
Telephone: (206) 441-0203

1 \$450.00 per hour; Associates: \$350.00 per hour; and Paralegals: \$150.00 per hour. Final compensation of fees plus  
2 reasonable expenses will be subject to Bankruptcy Court approval after notice and hearing. Mr. Linde has indicated  
3 a willingness to act on my behalf and to be compensated under the terms and conditions set forth in this paragraph.  
4 No retainer has been paid or promised.

5 5. I have previously retained Mr. Linde and the law firm of Schweet, Linde & Coulson, PLLC as  
6 counsel for Trustee in other bankruptcy cases. I am aware of no connections between Mr. Linde or Schweet, Linde  
7 & Coulson, PLLC and the Debtor, creditors, any party in interest, their respective attorneys and accountants, the  
8 United States Trustee, or any person employed in the Office of the United States Trustee, other than as set forth  
9 above and in Mr. Linde's declaration filed herewith. No notice to creditors or interested parties of this motion is  
10 necessary pursuant to 11 U.S.C. section 102(1) and FRBP 2002. To my knowledge, Mr. Linde and Schweet, Linde  
11 & Coulson, PLLC are neither a creditor of the Estate nor represent any interest adverse to the Estate in the matters  
12 for which they are being retained.

13 WHEREFORE, I request entry of an order authorizing me to employ Thomas S. Linde and Schweet, Linde  
14 & Coulson, PLLC as general counsel for the Estate in the above-captioned case, under the terms recited above.

15 DATED this 20<sup>th</sup> day of December, 2021.

16 /s/Virginia A. Burdette  
17 Virginia A. Burdette, WSBA #17921  
18 Chapter 7 Trustee

19 The undersigned declares under the penalty of perjury that she provided the U.S. Trustee's Office with a  
20 copy of this motion, statement of disinterest, and proposed order on December 20, 2021. It was approved via email  
21 on December 21, 2021.

22 Dated this 21<sup>st</sup> day of December, 2021.

23 /s/ Caitlin N. Christensen  
24 Caitlin N. Christensen  
Assistant to Virginia A. Burdette, Chapter 7 Trustee